

1 Scott A. Kronland (SBN 171693)
2 Stacey M. Leyton (SBN 203827)
3 Eileen B. Goldsmith (SBN 218029)
4 Danielle E. Leonard (SBN 218201)
5 Robin S. Tholin (SBN 344845)
6 James Baltzer (SBN 332232)
7 ALTSHULER BERZON LLP
8 177 Post Street, Suite 300
9 San Francisco, CA 94108
10 Tel. (415) 421-7151
11 Fax (415) 362-8064
12 skronland@altber.com
13 sleyton@altber.com
14 egoldsmith@altber.com
15 dleonard@altber.com
16 rtholin@altber.com
17 jbaltzer@altber.com

18 *Attorneys for Plaintiffs*

19 [Additional Counsel not listed]

20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO;
AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO, et al.,

Plaintiffs,

v.
UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' CORRECTED
NOTICE OF DEPOSITION OF
TREVOR NORRIS**

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Orders of the U.S District Court for the Northern District of California in the above-captioned case and Federal Rule of Civil Procedure 30, Plaintiffs, by and through undersigned counsel, will take the deposition of U.S. Department of Treasury Deputy Assistant Secretary for Human Resources Trevor Norris on **March 31, 2025** at **9:00 am EST** at 805 15th Street, NW Ste 1000, Washington, DC 20005. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Trevor Norris by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial.

1 DATED: March 20, 2025

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Scott A. Kronland
Stacey M. Leyton
Eileen B. Goldsmith
Danielle E. Leonard
Robin S. Tholin
James Baltzer
ALTSHULER BERZON LLP
177 Post St., Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151

By: /s/ Danielle Leonard

Attorneys for Plaintiff Organizations

Norman L. Eisen (*pro hac vice*)
Pooja Chadhuri (SBN 314847)
STATE DEMOCRACY DEFENDERS
FUND
600 Pennsylvania Avenue SE #15180
Washington, DC 20003
Tel: (202) 594-9958
Norman@statedemocracydefenders.org
Pooja@statedemocracydefenders.org

By: /s/ Norman L. Eisen

Attorneys for Plaintiff Organizations

Rushab Sanghvi (SBN 302809)
AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES
80 F Street, NW
Washington, DC 20001
Tel: (202) 639-6426
Sanghr@afge.org

By: /s/ Rushab Sanghvi

*Attorneys for Plaintiff American Federation of
Government Employees (AFGE)*

Teague Paterson (SBN 226659)
Matthew Blumin (*pro hac vice*)
AMERICAN FEDERATION OF STATE, COUNTY,
AND MUNICIPAL EMPLOYEES
1625 L Street, N.W.

1 Washington, D.C. 20036
2 Tel: (202) 775-5900
3 TPaterson@afscme.org
MBlumin@afscme.org

4 By: /s/Teague Paterson

5 *Attorneys for Plaintiff American Federation of State
6 County and Municipal Employees (AFSCME)*

7 Tera M. Heintz (SBN 241414)
8 Cristina Sepe (SBN 308023)
9 Cynthia Alexander, WA Bar No. 46019 (pro hac vice)
10 Deputy Solicitors General
11 OFFICE OF THE WASHINGTON STATE
12 ATTORNEY GENERAL
13 800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744
terah Heintz@atg.wa.gov
cristina.sepe@atg.wa.gov
cynthia.alexander@atg.wa.gov

14 By: /s/ Tera M. Heintz

15 *Attorneys for Plaintiff State of Washington*

PROOF OF SERVICE

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300, San Francisco, California 94108. On March 20, 2025, I served the following document(s):

PLAINTIFFS' CORRECTED NOTICE OF DEPOSITION OF TREVOR NORRIS

on the parties, through their attorneys of record, as designated below:

By Electronic Service: By Email, I caused such document(s) to be served via electronic mail on the parties in this action by transmitting true and correct copies to the following email address(es):

KELSEY J. HELLAND
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Kelsey.Helland@usdoj.gov

JAMES D. TODD, JR.
YURI S. FUCHS
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
James.Todd@usdoj.gov
Yuri.S.Fuchs@usdoj.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed March 20, 2025, at San Francisco, California.

/s/ Giorgia Lingiardi
Giorgia Lingiardi